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\*Reply to Ellis County Office

December 1, 2014

**VIA ELECTRONIC FILING**

The Honorable Analisa Torres, United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

RE: *A & G, Inc. v. Mooyeon Kim*, Case No. 14-CV-7937

Dear Judge Torres:

This letter-motion is filed pursuant to your Individual Practices I.D and II.B. The initial case management conference in the above-referenced case is scheduled for December 8, 2014 at 4:15 p.m. The Defendant's answer deadline is December 3, 2014. I was contacted by Brad Newberg of Tysons Corner, Virginia, who advised that he had been retained to represent Mr. Kim. Mr. Newberg requested my agreement to an extension of Mr. Kim's answer deadline. I agreed that my client would not seek a default judgment so long as Mr. Kim's answer was filed by December 22, 2104. Thus, Mr. Kim's counsel has not, and will not, make an appearance at least one week prior to December 8, 2014. Accordingly, I submit this letter-motion requesting an adjournment of the initial case management conference until January 2015. I further request a corresponding extension of the deadline for the parties to file the required joint letter with a proposed Case Management Plan and Scheduling Order.

I appreciate the Court's attention to this matter. Please let me know whether any additional information is required of me at this juncture.

Sincerely,

/s/ Dan Gus

Dan Gus

The Honorable Analisa Torres  
December 1, 2014  
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